

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

CASSANDRA WILLIAMS,

Plaintiff,

vs.

CAUSE NO. 3:19-cv-927 DPJ-FKB

**CANTON PUBLIC SCHOOL
DISTRICT, COURTNEY RAINEY,
MOSES THOMPSON, SHIVOCHE
DINKINS, ERIK GILKEY, ANDREW
GRANT, DAPHNE SIMS, FRED ESCO,
JR., LISA ROSS, TIM TAYLOR AND
LES PENN,**

Defendants.

**DEFENDANT CANTON PUBLIC SCHOOL DISTRICT'S
MOTION TO DISMISS**

Defendant, Canton Public School District, (“the School District”), through counsel and pursuant to Rules 12(b)(6) and 8(c) of the *Federal Rules of Civil Procedure*, hereby moves to Dismiss Plaintiff’s claims against the School District with prejudice. For grounds, the School District avers that Plaintiff’s tort claim for breach of covenant of good faith and fair deal, as well as her tort claim for tortious interference with contract, is barred by the applicable statute of limitations. The tort claims, alternatively, also fail as a matter of law. Similarly, Plaintiff’s remaining causes of action against the School District (state federal RICO claims, Fifth and Fourteenth Amendment violations, and breach of contract claim) also fail as a matter of law. In support of said motion, the School District relies upon the Memorandum of Law and Argument contemporaneously filed herewith.

Respectfully submitted this, the 9th day of January, 2020.

/s/ Erica J. Lloyd

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon all counsel of record via the Court's ECF filing system as follows:

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This the 9th day of January, 2020.

/s/Erica J. Lloyd
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